MIED ProSe 1 (Rev 5 16) Complaint for a Civil Case

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN

Jane Doe

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Erik Edoff Meredith Beard Andrea Glynn Nicholas Ellul Stacey Detrick Lori Oneal Deborah langkem

ET. ALL 8g1-2 See Attachment 1

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case: 2:24-cv-13209 Assigned To: Cox, Sean F. Referral Judge: Grand, David R.

Assign. Date: 12/3/2024

Description: DOE V. EDOFF ET. AL

(CMP) (TH)

(to be filled in by the Clerk's Office)

Jury Trial:

☐ Yes ☐ No

(check one)

Complaint for a Civil Case

The Parties to This Co I.

A. The	Plain	tiff(s)
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В.

arties to This Complaint	
The Plaintiff(s)	
Provide the information belo additional pages if needed.	w for each plaintiff named in the complaint. Attach
Name	Jane Doe
Street Address	P.O. BOX 180001
City and County	Utica macomb
State and Zip Code	Michigan 48318U
Telephone Number	(586) 208-3614
E-mail Address	light of the world 5@ myyahoo. com
The Defendant(s)	
defendant is an individual, a For an individual defendant, additional pages if needed. Defendant No. 1 Name Job or Title	w for each defendant named in the complaint, whether the government agency, an organization, or a corporation. include the person's job or title (if known). Attach (See A + achment # 2) (Pg1-10) Erik Edoff Individual Tormer Lanse Crowse Public School-Supercoded Arry L. Wheeler Community Cenkr & Administration offices 2407 Lo Fredrick funkow Blvd Clinton Township, macomb Michigan 48036
Defendant No. 2	
Name	Meredith Board individual
Job or Title (if known)	Principle-Lanse Creuse High School-North
Street Address	23700 Twonty-one Mile Rd
City and County	Macomb Tourship, macomb
State and Zip Code	michigan 48042
Telephone Number	J

E-mail Address (if known)

MIED ProSe 1 (Rev 5:16) Complaint for a Civil Case

Defendant No. 3	A 1
Name	Andrea 6 lynn
Job or Title	Principle - lanse Creux Middle School - North
(if known)	
Street Address	46201 Fairchild
City and County	Macomb Township, Macomb
State and Zip Code	Michigan 48042
Telephone Number	J
E-mail Address (if known)	
Defendant No. 4	
Name	Stacey Detrick
Job or Title	ASSISTENT PRINCIPE-Lanse Crown Middle Short -No
(if known)	410
Street Address	46201 Fairchild
City and County	Macamb Township, Macamb
State and Zip Code	michigan 48042
Telephone Number	
E-mail Address (if known)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the	basis for federal court jurisdiction?	tcheck	all that apply)
Œ	Federal question		Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

attachmen+ #2 (Page 1 of 10)

Defendant No.5

Name: Nicholus Ellul individual

Job or Title: Assistant Principal LC HS-North

Street Address: 23700 twenty one Mile Rd

City and County: Macomb Township, Macomb

State and Zip Code: Michigan 48042

Telephone number (586)

Email Address:

Defendant No. 6 Name: Michael Poljanae individual Johoz Title: Dean of Students L.C. HS-North Address: 23700 twenty one Mile Rd Macomb Township, macomb Michigan 48042 (586)

Defendant No.7

Nome: Lori Oneal individual

Job/Title: Courselon L.C.HS-North

Address: 23700 Tuenty one Mile Rd

Macomb Township, Macomb

Michigan 48042

Case 2:24-cv-13209-SFC-DRG ECF No. 1, PageID.5 Filed 12/03/24 Page 5 of 22

Chrent

(Pg. 2 of 10)

Defendant 100.8

Dame: Deborah langkem inclividual

Job: Courselor-lanse Creuse Middle School-North

Address: 46201 Fairchild

Macomb Tourship, macomb

Michigan 48042

Defendant No. 9

Name: Megan Janisa individual

JOD:

- Lanse. Creuse High School Num

Address: 23700 Twenty-One mire Rd

Macomb Township, Macomb

Mi Chigan 48042

Defendant 100.10

Mame: Bryan lorenzo individual
Job: 6th grade 64m Teacher L'asse crouse Middle-Morth
Address: 46201 Fairchild

Macomb Township, macomb

Michigan 48042

Defendant No. 11

Name: Kelli Bernard Individual

Job: 6th grade Art Teacher L'anse Creuse Middle school North.

Address: 46201 Fairchild

Maccomb Township, macomb

Michigan 48042

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attachment (Pg 3 of 10)

Defendant No. 12

Name: Allison Boska individual

Db: Loth grade Science Teacher - L'anse Crouse Middle School

Address: 46201 Fairchild

Macomb Tourship, Macomb

Michigan 48042

(586)

Defendant No 13

Name: Tina Bennion Individual
Job: 6thgrade Social Stud-Teacher - Lanse Crecke Leidelle School-Non
Address: 46201 Fair Child

Macomb Tourship macomb

michigan 48042

680

Defendant No. 14

Name: Ashley lauretti individual

Job: 6th grack English Teacher - Lanse Creuse Middl. School North

Address: 46201 Fairchild

Macomb Township, macomb

Michigan 48042

(586)

Defendant No. 15

name: Kim Nyenhuis individual
Job: 6mb Dome-Teacher - Lanse Creuse Middle School - North
Address: 46201 Fairchild
Macomb Township, macomb
Michigan 48042

attachment (1g4 of 10)

Defendant NO. 16

Name: Jacqueline Ferrazza individual
Jib: 69 mil Tech Ed Teacher - Lanse Creuse Middle School-Nur
Address: 46201 Fairchild

Macomb Tounship, macomb

Michigan 48042

Defendant No. 17

Name: Laura Tremblay Individual

This: Thinks Soc. Studies Teacher - Lanse Circuse Middle School - North

Address: 46201 Fairchild

Macomb Township, Macomb

Michegan 48042

Defendant No. 18

name: Somentha moucha individual

Tob! Agrade Math Teacher-Lanse Creuse Licade School-Norm

Address: 46201 Fairchild

Macomb Tourship, macomb

michigan 48042

Defendant No. 19

Name: Joseph monteleone. Individual

Job: Mygnode Science Teachor-Lanse Crouse Middle School-North

1Address: 46201 Fairchild

Macumb Township, macomb

Michigan 48042

attachment (lg 50f 10)

Defendant No. 20

Name: Angela Capadagli individual

Job: 7th grade English Teacher-Lanse Crowse Middle School North

Address: 46201 Fair Child

Maccomb Township, Maccomb

Michigan 48042

Defendant No. 21
name: Sneha Mosati individual
Job: 7th grade Chior Teacher 18t Quater L.C.M.S-North
Address: 46201 Fairchild
Macomb Township, macomb
mi Chigan 48042

Defendant No. 22
name: Maryjean York individual
Dob: 7th grade Comptent Internet L.C.M.S-North
7th grade Chior 2,3,4 Quoter L.C.M.S-North
Address: 46201 Fairchild
macomb Township, macomb
michigan 48042

Defendant No.23 name: Alisha Krcek individual Job: 8th grade Science - Lánse Creuse Middle scholl-NEAL Address: 46201 Fairchild macomb Township

attachment (Pg 60F10)

Decendant No. 24

Name: Carrie Fajou individual
Job: Soc Stud. 8th Teacher C.C.M. S-North
Address: 46201 Fairchild
Macomb Tourship, macomb
Michigan 48042

Defendant No. 25
Name: Cindy Eckenswiller Individual
Job: 8th Grade English Teacher L.C. M.S-north
Address 46201 fairchild
Maconto Tourship, macomb
Michigan 48042

Defendant No 26

name: Jordan David Individual

Job: 12th grade italian Teacher L.C.HS-North

Address 23700 Twenty-one Hile rd

Macomb Township, macomb

michigan 48042

Defendant 27
Name: John Pizzo individual
Job: 12th Grade Statistics L.C. HS - North
23700 Twenty - one mile rd
Macomb Township, macomb
Muchigan 48042

attachment (ng 70610)

Defendant NO.28

name: Army Trudeu individual

500: 12th Grade English L.C.H.S-North
Address: 23700 Tuenty-one Mile 13d

macomb Tourship, macomb

michigan 48042

Defendant No. 29

name: Luciano Crescentini individual

Doto: 12th Grade Health ED L.C.H.S-North

23700 Twenty-one Hile rd

Macomb Township, macomb

michigan 48042

Defendant 100.30

name: Kitty Reifert individual
Job: 12th Grade Creative writting L.C. It. S-North
Address: 23700 Twenty-One Mile rd

macomb Township, macomb

michigan 48042

Defendant No.31

_name: Carrie Kaitz individual
500: 12th grade physics L.C. H. S-North
Addres: 23700 Tuenty-one mile Rd
Macombo Township, macomb
Michigan 48042

attachment (Pg 8 oc 10)

DeGendant No. 32 Name: Dawn Hannawi individual Job: 11th grade Social Studies 1st Semester Address: 23700 Twenty-one mile Rd Macomb Tourship, macomb michigan 48042

Defendant No.33

Name: Terry Elvry individual

Job: 11th grade Social Studius 2nd Semester

Address: 23200 Twenty-one mile rd

Macomb Township, macomb

michigan 48042

Defendant No. 34

Namo: Sheila Springstein individual

Job: 2D Act L'airse Creus High School-North

Address: 23700 Twenty-one mile rd

macomb Township, macomb

michigan 48042

Defendant NO.35

name: Kyle Hagel individual

500: 1st Semester Algebra! Tracher LC.H.S-North

Address: 23700 Twenty-one mile rd

macomb Township, macomb

michigan 48042

a ++achment (Pg 9 of 10)

Defendant No. 36

rame: Elmir Sabanovic individual

Job: 2nd Semester Agelora 1 Teacher L.C.H.S-North Address: 23700 Twenty-one mile rd macomb Township, macomb Michigan 48042

Defendant No.37 name: Kayla Gramer individual
Job: 1st Semester Algebra 2 Teacher L.C. H.S-North
23700 Twenty-one mile rd
Malomb Township, macomb Michigan 48042

Defendant No. 38 name: Deana Patterson individual Job: 2nd Semester Algebra 2 Teacher LCHS.-11 rth Address: 23700 Twenty-one Mile rd Macomb Township, macomb michig.n 48042

attachment (PG 10 of 10)

Defendant w. 39

Name: Daniel Scharf individual

JOO: Acting Team Leader U.S. Department of Education of Rice of CIVIT

Rights Division-Ohio Branch

Address: 1350 Euclid Avenue Suite 325 Cleveland Ohio 44115-1812

Défendant No. 40 name: Chandra S. Baldwin individual Job: Senior Attorney U.S. Department of Education Office of Civil rights division-ohio Branch Address: 1350 Euclid Avenue Suite 325 Cleveland Onio 44115-1812

Defendant NO. 41 name: Suwan Park individual Jobi U.S. Depratment of Education Office of Civil Rights division-Ohio Branch Address: 1350 Euclid Avenue Suite 325 Cleveland Ohio 44/115-1812

Defendant No. 42 Name: John Cohen Individual JOD: Team leader U.S. Department of Education Office of Civil rights division - Ohio branch Address: 1350 Euclid Avenue Suite 325 Cleveland Ohio 44115-1812

E.T ALL (Page 1 of 2) attachment 1

Meredith Beard Andrea Olynn Nicholas Ellul Stacey Detrick Michael Poljanac Lori Oneal Deborah langkem Megan Janisa bryan Lorenzo Bernard Ilison Boska Tina Bennion Ashley Lauretti Kim Nyenhuis Jacqueline Ferrazza Laura Tremblay samantha mou'cha Joseph monteleone Mosati anjean york Krcek isha Arrie Fajou ndy, Eckenswiller ordan David John pizzo Amy Trudeau Luciang Crescentini Kitty Reifert Carrie Kaitz

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E.T. ALL
(Page 202)
AHachment 1
Continued

Sheila Springstein Kyle Hagel Elmir Sabanovic Kayla Gramer Deana Patterson Daniel Scharf Chandra Baldwin Suwan Park John Cohen B.

A.	If the Basis	for Jurisdiction Is	s a Federal Question
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Const	itution	fic federal statutes, federal treaties, and/or provisions of the United States that are at issue in this case.
14	Ad	mendment - Equal protection clause
in H lif If the	vil r he (Dert Basis 1	mendment - Equal protection clause ignts Act of 1866 - An Act to protect all Per smited States in their Civil rights and ics, and furnish the means of their Vindication Is Diversity of Citizenship of their Vindication
1.		laintiff(s)
	a.	If the plaintiff is an individual The plaintiff, (name), is a citizen of the State of (name)
	b.	If the plaintiff is a corporation The plaintiff, (name), is incorporated under the laws of the State of (name), and has its principal place of business in the
		State of (name)
	(If mo provid	re than one plaintiff is named in the complaint, attach an additional page ling the same information for each additional plaintiff.)
2.	2. The Defendant(s)	
	a.	If the defendant is an individual The defendant, (name), is a citizen of the State of (name) Or is a citizen of (foreign nation)
	b.	If the defendant is a corporation The defendant, (name), is incorporated
		, is incorporated

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

has its principal place of business in the State of (name)

of business in (name) ______.

under the laws of the State of (name) ______, and

______. Or is incorporated under the laws of _______, and has its principal place

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

(See Attachment #3)

Attachment 3

III. Statement of claim

Something always seemed off and not quite right with the way my children's grades and GPA were displayed on Powerschool and in 2022 the fraud surfaced of multiple staff members employed with L'Anse Creuse Middle School North, L'Anse Creuse High School North and L'Anse Creuse Public School System; Illegally manipulating the Powerschool and Schoology systems and illegally Falsifying Public School Records which resulted in my children being overlooked for school awards, academic scholarships and grant opportunities that they otherwise would have been eligible for, the opportunity to be valedictorian, salutatorian as well as kept them ineligible to have their California, New York and Illinois entertainment permits renewed from 2022 until the present.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

(See Attachment #4)

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: $12-3$	<u>-</u> . 20 <u>24</u>	
Signature of Plaintiff	Jane Doe	
Printed Name of Plaintiff	Jane Dor	

Attachment 4

IV. Relief

Seeking 655,640 dollars in actual damages for my children's missed Scholarship and Grant opportunities, missed opportunity to be class Valedictorian, Salutatorian, 1 year of salary wages as well as loss wages for modeling and acting jobs that could not be sought after because the California, New York and Illinois licenses were not able to be renewed during the time of these offenses. I'm also seeking pain and suffering due to the unnecessary stress and anxiety these actions are continuing and they continue to display false/ manipulated grades that give the false fabricated impression that my children are not doing satisfactory in their academic classes which resulted and continues to result in a False /Fabricated reporting of a lower grade and lower GPA then what has actually been achieved.

Seeking Punitive damages in the amount of 150 million dollars because the actions of these defendants are wrong and when anyone who took an oath to protect and to serve are found out to be doing the exact opposite they do not deserve to continue to carry the title that they hold and anyone who thinks they should be able to get away with such deplorable deeds should have to pay the consequences for their action and I hope this dollar amount sends a strong message to anyone thinking of doing this to another child and thinking they will get away with it; to think again.

18.44 (Rev. 10/20) Case 2:24-cv-13209-SFC-DEEV HOEQVERPSHEET1 Filed 12/03/24 Page 21 of 22 The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM) I. (a) PLAINTIFFS DEFENDANTS Erik Edoff Jane Doe (b) County of Residence of First Listed Plaintiff County of Residence of First Listed Defendant (ENCEPT IN U.S. PLAINTIFF CASES (IN U.S. PLAINTIFF CASES ONLY) IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. (C) Attorneys (Firm Name, Address, and Telephone Number) Attorneys (li Kninen) 11. BASIS OF JURISDICTION (Place an "X" in One Box Only) III. CITIZENSHIP OF PRINCIPAL PARTIES (Place on "X" in One Box for Planning (For Diversity Cases Only) and One Box for Defendanti-1 U.S. Government X3 Federal Question PIF Plaintiff (U.S. Government Not a Party) Unizen of This State □ 1 Incorporated or Principal Place of Business In This State 2 U.S. Government 4 Diversity Citizen of Another State 2 Incorporated and Principal Place Detendant (Indicate Citizenship of Parties in Item III) of Business In Another State Citizen or Subject of a 3 Toreign Nation $\Box 6$ □ 6 Foreign Country NATURE OF SUIT (Place on "X" in One Box Only) Click here for: Nature of Suit Code Descriptions. CONTRACT : BANKRUPTCY OTHER STATUTES FORFEITURE/PENALTY 110 Insurance PERSONAL INJURY PERSONAL INJURY 7625 Drug Related Seizore 422 Appeal 28 USC 158 375 False Claims Act 120 Marine 310 Airplane 365 Personal Injury -423 Withdrawal of Property 21 USC 881 376 Qui Tam (31 USC 130 Miller Act 315 Airplane Product 1690 Other Product Lubility 28 USC 157 3729(a)) 140 Necotable Instrument Liability 367 Health Care! 400 State Reapportionment 150 Recovery of Overpayment 320 Assault, Libel & Pharmaceutical PROPERTY RIGHTS 410 Antitrust & Enforcement of Judgmen Slander Personal Injury 820 Copyrights 430 Banks and Banking 151 Medicare Act 330 Federal Employers' Product Liability 830 Patent 450 Commerce 152 Recovery of Defaulted Liability 368 Ashestos Personal 835 Patent - Abbreviated 460 Deportation Student Loans 340 Marine Injury Product New Drug Application 470 Racketeer Influenced and (Excludes Veterans) 345 Marine Product Liability 840 Frademark Corrupt Organizations [] 153 Recovery of Overpayment PERSONAL PROPERTY Liability LABOR 880 Defend Trade Secrets 3 480 Censumer Credit of Veteran's Benefits 350 Motor Vehicle 370 Other Fraud 710 Fair Labor Standards Act of 2016 (15 USC 1681 or 1692) 1160 Stockholders' Suits 355 Motor Vehicle 371 Truth in Lending 485 Telephone Consumer Act 190 Other Contract Product Liability 380 Other Personal 720 Labor Management SOCIAL SECURITY - 3 Protection Act 195 Contract Product Liability 360 Other Personal Property Damage Relations 861 HIA (1395ff) 490 Cable Sat TV 196 Franchike Injury 385 Property Damage 740 Railway Labor Act 862 Black Lung (923) 850 Securities/Commodities/ 362 Personal Injury -Product Liability 751 Family and Medical 863 DIWC(DIWW (405(g)) Exchange Medical Malpractice Leave Act 864 SSID Title XVI 890 Other Statutory Actions REAL PROPERTY CIVIL RIGHTS PRISONER PETITIONS 790 Other Labor Litigation 865 RSL(405(g)) 891 Agricultural Acts 210 Land Condemnation 440 Other Civil Rights Habeas Corpus: 791 Employee Retirement 893 Environmental Matters 220 Foreclosure 441 Voting 463 Alten Detainee Income Security Act FEDERAL TAX SUITS 895 Freedom of Information 230 Rent Lease & Ljectment 442 Employment 310 Motions to Vacate 870 Taxes (U.S. Plaintiff Act 240 Torts to Land 443 Housing. Sentence or Defendant) 896 Arbitection 330 General 245 Fort Product Liability Accommodations 871 IRS -- Third Party 899 Administrative Procedure 1445 Amer w Disabilities 335 Death Penalty 290 All Other Real Property IMMIGRATION 26 USC 7609 Act Review or Appeal of Employment Other: Agency Decision 462 Naturalization Application 446 Amer w Disabilities 340 Mandamus & Other 950 Constitutionalus of 465 Other Immigration Other 350 Civil Rights Actions State Statutes 448 Education 555 Prison Condition 1 560 Civil Detainee -Conditions of Continement V. ORIGIN (Place on "A" in One Box Only) Original 2 Removed from 4 Reinstated or 5 Transferred from 6 Multidistrict 8 Multidistrict □ 3 Remanded from Proceeding State Court Appellate Court Reopened Another District Litigation -Litigation -(specify) Transfer. Direct File Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): US Civil Statue 18 U.S.C & 1001 VI. CAUSE OF ACTION Brief description of cause: Falsified Public School records VII. REQUESTED IN CHECK IF THIS IS A CLASS ACTION DEMAND \$ CHECK YES only if demanded in complaint: UNDER RULE 23, F.R CV.P. COMPLAINT: JURY DEMAND: Yes No VIII. RELATED CASE(S) (See instructions), IF ANY JUDGE DOCKET NUMBER SIGNATURE OF ATTORNEY OF RECORD 12-3-2024 FOR OFFICE USE ONLY SEAN F

RECEIPT#

AMOUNT

APPLYING IFP

MAG JUDGE GRANI

JUDGE COX

Case 2:24-cv-13209-SFC-DRG ECF No. 1, PageID.22 Filed 12/03/24 Page 22 of 22 PURSUANT TO LOCAL RULE 83.11 1 Is this a case that has been previously dismissed? If yes, give the following information: Court: Case No.: Judge: ____ 2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other Yes court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.) If yes, give the following information: Court: Case No.: Judge: _____ Notes: